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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

Jane Doe,

Plaintiff,

v.

Embry-Riddle Aeronautical University, Inc.,
a Florida not for profit Corporation,

Defendant.

No. 3:24-cv-08100-SMB

**JOINT STIPULATION FOR
EXTENSION OF CASE
DEADLINES**

(Second Request)

Pursuant to LRCiv 7.3, the parties respectfully submit the following Joint Stipulation and separate Proposed Order and request that the Court modify its Case Management Order [Doc. 44] and January 15, 2025 Order [Doc. 62] to extend the remaining case deadlines by approximately 60 days, as set forth below. This is the second request by the parties for the modification of the Case Management Order [Doc. 44].

Good cause exists for the requested extensions because the parties have engaged in written discovery, have exchanged multiple disclosure statements, and Plaintiff has taken the Rule 30(b)(6) deposition of Embry-Riddle Aeronautical University, Inc. (“ERAU”). However, due to circumstances beyond the parties’ control, including ERAU’s, Plaintiff’s, and counsel’s work-related schedules, the parties are unable to complete discovery – including ERAU’s taking Plaintiff’s deposition – under the present deadlines.

Accordingly, the parties request an approximately 60-day extension on each of the remaining case deadlines, as follows:

Event	Current Deadline	Proposed Deadline
Fact Discovery	3/28/2025	5/30/2025
Expert Disclosures	5/2/2025	7/3/2025
Rebuttal Expert Disclosures	5/30/2025	8/1/2025
Expert Depositions	6/27/2025	8/29/2025
Good Faith Settlement Talks	4/18/2025	6/20/2025
Dispositive Motions	7/28/2025	9/26/2025

For the foregoing reasons, the parties respectfully request that the Court enter the separate Proposed Order lodged concurrently with this Stipulation.

DATED this 25th day of March, 2025.

LEHRMAN LAW

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